

HURWITZ STAMPUR & ROTH
ATTORNEYS AT LAW

MICHAEL HURWITZ
WILLIAM J. STAMPUR
JAMES ROTH

299 BROADWAY, STE. 800
NEW YORK, N.Y. 10007

TEL: 212-619-4240
FAX: 212-619-6743

June 24, 2008

VIA FACSIMILE: 212-805-0426

The Honorable Laura Taylor Swain
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: United States vs. Ivan Coss
INF. 08 CR 411 (LTS)

Dear Judge Swain,

Mr. Coss was informed today that his father died. The funeral will be held in the Dominican Republic, at this time the defendant does not have the details but wishes to travel to the Dominican Republic if permission is granted, and as soon as arrangements can be made.

He will return sometime after the funeral but of course has not made those arrangements. Mr. Coss will inform my office of travel details, which I will give to his Pretrial Officer and the Government when they become available.

At this time, Mr. Coss asks permission to travel to the Dominican Republic.

I have left phone messages with AUSA Daniel Levy and Pretrial Officer Tom Marino requesting permission to travel; neither has yet responded to my request.

Defendant is granted permission to travel to the Dominican Republic in connection with the funeral for a period of up to ten days, subject to prior notification to the Pretrial Services Officer of itinerary and contact information. Pretrial Services shall return Mr. Coss passport to him and resume custody of the passport upon his return.

cc. Pretrial Officer Tom Marino (By Fax: 212-805-4175)
AUSA Dan Levy (By Fax: 212-637-2429)

Sincerely,

Michael Hurwitz

SO ORDERED.

Copies furnished to
MH:jy Chambers of Judge Swain
James S. C. Judge Swain

6-24-08

MH/COSS, I/FUNERAL

LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE